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VIA ELECTRONIC FILING

The Honorable Christopher J. Burke
U.S. District Court for the District of Delaware
J. Caleb Boggs Federal Building
844 North King Street
Wilmington, Delaware 19801

Re: International Business Machines Corporation v. Groupon, Inc.,
C.A. No. 16-122-LPS-CJB

Dear Magistrate Judge Burke:

Plaintiff International Business Machines Corporation and Defendant Groupon, Inc.
respectfully submit the attached agreed upon Protective Order for Your Honor's consideration.

Counsel are available at the Court's convenience if Your Honor has any questions.

Respectfully,

/s/ David E. Moore

David E. Moore

DEM:nmt/1236994/43155

Enclosure

cc: Clerk of Court (via hand delivery)
Counsel of Record (via electronic mail)